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Counsel for Defendant ROBERT DOYLE

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
Plaintiff,

v.

ROBERT THOMAS DOYLE,  
Defendant.

No. CR 14 -0092 JST

STIPULATION AND ~~PROPOSED~~  
ORDER CONTINUING CHANGE OF  
PLEA DATE; EXCLUSION OF TIME

**STIPULATION**

IT IS HEREBY STIPULATED, by and between the parties to this action, that the change of plea date for defendant Robert Doyle, currently scheduled for February 6, 2015 at 9:30 a.m., may be continued one week to February 13, 2015, at 9:30 a.m. for change of plea. The reason for the request is that defense counsel will be out of the country and unavailable on February 6, 2015. February 13, 2015, is the next available date to all parties

IT IS FURTHER STIPULATED THAT the time to February 13, 2015, should be excluded in accordance with the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(1)(A) and (h)(7)(B)(iv) for continuity of counsel and effective preparation taking into consideration due diligence to enable defense counsel to be present at the change of plea and also for the parties to review discovery and agree upon a

1 resolution prior to the change of plea date.

2 DATED: 1/26/15

/s/  
\_\_\_\_\_  
JOYCE LEAVITT  
Assistant Federal Public Defender

4 DATED: 1/26/15

/s/  
\_\_\_\_\_  
THOMAS MOORE  
Assistant United States Attorney

7 I hereby attest that I have permission of the parties to enter a conformed signature (/s/) for all  
8 signatures within this e-filed document.

9 **ORDER**

10 GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the change of plea date for  
11 Robert Doyle, may be continued one week to February 13, 2015, at 9:30 a.m. for change of plea.

12 IT IS FURTHER ORDERED THAT the time to February 13, 2015, should be excluded in  
13 accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(1)(A) and  
14 (h)(7)(B)(iv) for continuity of counsel and effective preparation of counsel taking into consideration  
15 due diligence to enable the defense to be present for the change of plea, and for the parties to review  
16 discovery and agree upon a resolution prior to the change of plea date. The Court finds there is good  
17 cause and that the ends of justice served by the granting of the continuance outweigh the interests of  
18 the public and defendant in a speedy and public trial. Failure to grant the requested continuance  
19 would unreasonably deny counsel reasonable time necessary for effective preparation, taking into  
20 account due diligence.

23 SO ORDERED.

24 DATED: January 27, 2015

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HON. JON S. TIGAR  
United States District Judge